

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

Demetrice Antonio Jones
Cheryl Dionne Jones

Case No. 15-35268-KLP

Debtors

Chapter 13

21500 Court St.
S. Chesterfield, VA 23803

AP No. 15-03459

Last four digits of Social Security or Individual Tax-payer
Identification (ITIN) No(s)., (if any): 8179, 2467

v.

Old Towne Motors, Inc.

Defendants

NOTICE OF MOTION FOR EXPEDITED HEARING

Debtors have filed papers with the court to Expedite the Hearing on Debtors' Motion to Recover Property of the Bankruptcy Estate Pursuant to 11 U.S.C. §362(a).

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before **November 10, 2015 at 10:30 a.m.**, you or your attorney must:

[X] File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

Brian K. Stevens, Esquire
The America Law Group, Inc.
2312 Boulevard, Colonial Heights, VA 23834

[] Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**

[X] Attend the hearing on the motion (or objection) scheduled to be held on **November 10, 2015 at 10:30 a.m.** at the United States Bankruptcy Court, 701 East Broad Street, Ctrtm 5100 Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: November 3, 2015

Signature, name, address, and telephone number of person giving notice:

/s/ Brian K. Stevens

Brian K. Stevens, Esq.
The America Law Group, Inc.
2312 Boulevard
Colonial Heights, VA 23834
804-921-9244
Counsel for Debtors

Certificate of Service

I hereby certify that I on November 3, 2015, have mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the Defendant, Old Towne Motors, Inc., William David Mueller, Registered Agent, 544 East Washington Street, Petersburg, VA 23803.

/s/ Brian K. Stevens

Brian K. Stevens, Esq.

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Defendants

**MOTION FOR EXPEDITED HEARING
ON DEBTORS' MOTION TO RECOVER PROPERTY
OF THE BANKRUPTCY ESTATE**

COMES NOW, the Debtors, by counsel, and as and for their Motion for an Expedited Hearing pursuant to Rule 9013 and Local Rule 9013(N), states as follows:

1. On October 12, 2015, Debtors filed a Petition in Bankruptcy.
2. On November 3, 2015, the Debtor filed a Motion to Recover Property Pursuant to 11 U.S.C. §362 (a)(3) and Notice of Motion.
3. Counsel has requested a hearing before the Court on Tuesday, November 10, 2015 at 10:30 a.m. to be heard on this Motion.

Demetrice Antonio Jones

Cheryl Dionne Jones

/s/ Brian K. Stevens

Brian K. Stevens, Esq. VSB#25974
The America Law Group, Inc.

2312 Boulevard, Colonial Heights, VA 23834
(804) 520-2428

CERTIFICATION

I, Brian K. Stevens, pursuant to Local Rule 9013 (N), do hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an expedited hearing.
2. I have not created the emergency through any lack of due diligence.
3. This request could not be resolved without a hearing.

/s/ Brian K. Stevens
Brian K. Stevens, Esq.
America Law Group, Inc.
2312 Boulevard
Colonial Heights, VA 23834
Counsel for Demetrice Antonio Jones and
Cheryl Dionne Jones

CERTIFICATE OF SERVICE

I hereby certify that on this November 3, 2015, a copy of the foregoing Motion was electronically transmitted and/or mailed/faxed to the Defendant, Old Towne Motors, Inc., William David Mueller, Registered Agent, 544 East Washington Street, Petersburg, VA 23803.

/s/ Brian K. Stevens
Brian K. Stevens, Esq.